

**FISHER & PHILLIPS LLP**  
SCOTT M. MAHONEY, ESQ  
Nevada Bar No. 1099  
DAVID B. DORNAK, ESQ.  
Nevada Bar No. 6274  
ALLISON L. KHEEL, ESQ.  
Nevada Bar No. 12986  
300 S. Fourth Street  
Suite 1500  
Las Vegas, NV 89101  
Telephone: (702) 252-3131  
FAX: (702) 252-7411  
[ddornak@fisherphillips.com](mailto:ddornak@fisherphillips.com)  
*Attorneys for Defendants/  
Third-Party Defendants*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

THE BOARD OF TRUSTEES OF THE  
CONSTRUCTION INDUSTRY AND  
LABORERS HEALTH AND WELFARE  
TRUST; THE BOARD OF TRUSTEES OF  
THE CONSTRUCTION INDUSTRY AND  
LABORERS JOINT PENSION TRUST; THE  
BOARD OF TRUSTEES OF THE  
CONSTRUCTION INDUSTRY AND  
LABORERS VACATION TRUST; THE  
BOARD OF TRUSTEES OF SOUTHERN  
NEVADA LABORERS LOCAL 872  
TRAINING TRUST,

Plaintiffs,

vs.

MOHAVE RESTORATION, INC. dba  
SERVICE MASTERS 1<sup>st</sup> RESPONSE, a  
foreign corporation; JEREMIAH L. COX, an  
individual,

Defendants.

THE BOARD OF TRUSTEES OF THE  
CONSTRUCTION INDUSTRY AND  
LABORERS HEALTH AND WELFARE  
TRUST; et al.

Plaintiffs,

Case No.: 2:16-cv-01190-JAD-CWH

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR  
DEFENDANTS/THIRD-PARTY  
DEFENDANTS TO FILE THEIR  
OPPOSITION TO THIRD-PARTY  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT (ECF  
NO. 42)**

(SECOND REQUEST)

ECF No. 47

1 vs.

2  
3 HANOVER INSURANCE COMPANY, a  
4 New Hampshire insurance company; NORTH  
5 AMERICAN SPECIALTY INSURANCE  
6 COMPANY, a New Hampshire insurance  
7 company; DOES 1 THROUGH 10, and ROE  
8 CORPORATIONS 1 THROUGH 10,  
9 inclusive,

10 Defendants.

11  
12 HANOVER INSURANCE COMPANY, a  
13 New Hampshire Insurance company;

14 Third Party Plaintiff,

15 vs.

16  
17 MOHAVE RESTORATION, INC. dba  
18 SERVICE MASTERS 1<sup>st</sup> RESPONSE, a  
19 foreign corporation; JEREMIAH L. COX, an  
20 individual,

21 Third Party Defendants.

22 IT IS HEREBY STIPULATED AND AGREED by the parties' counsel of  
23 record that the Defendants/Third-Party Defendants will have an extension of time up to  
24 and including **February 26, 2018** to file their Opposition to Third-Party Plaintiff's  
25 Motion for Summary Judgment (ECF No. 42), currently due on February 12, 2018.  
26 The parties have reached a settlement and would like a two week extension on the  
27 briefing of the Motion for Summary Judgment in order to finalize the settlement  
28 documents.

This is the second request for an extension of this deadline. This request will  
not prejudice any party or delay this proceeding given the previously granted extension  
of the dispositive motion deadline to March 9, 2018. (ECF No. 41).

///

///

1 The foregoing constitutes good cause for the extension of the deadline.

2 Respectfully submitted this 12th day of February, 2018.

3 Dated: February 12, 2018

**FISHER & PHILLIPS LLP**

4 /s/ Allison L. Kheel, Esq.

DAVID B. DORNAK, ESQ.

Nevada State Bar No. 6274

ALLISON L. KHEEL, ESQ.

Nevada State Bar No. 12986

300 South Fourth Street, Suite 1500

Las Vegas, Nevada 89101

Attorneys for Defendants

9 Dated: February 12, 2018

**JENNINGS STROUSS & SALOMON**

10 /s/ Patrick F. Welch, Esq.

PATRICK F. WELCH, ESQ.

Nevada State Bar No. 13278


One East Washington Av., Ste. 1900

Phoenix, AZ 85004-2554

Attorneys for Third Party Plaintiff

14 **ORDER**

15 **IT IS SO ORDERED.**

17 

18 U.S. District Judge Jennifer A. Dorsey  
February 14, 2018